Audit Report

Global Standard for Food Safety Issue 7: July 2015

1.Audit Summary			
Company name	**Vion Scherpenzeel B.V.**	BRC Site Code	**8476525**
Site name	**Vion Scherpenzeel B.V.**		
Scope of audit	**Deboning, cutting to specification, packing in bulk and consumer packaging (modified atmosphere, chilled) and freezing of pork. Production and packing in bulk packaging of cured and/or smoked bacon, meat preparations and mechanical separated meat, including Good Farming®-meat.**		
Exclusions from scope	**None**		
Justification for exclusion	**None**		
Audit Finish Date	**2016-10-19**		
Re-audit due date	**2017-10-31**		

Voluntary modules included		
Modules	Result	Details
Choose a module	**Choose an item**	
Choose a module	**Choose an item**	

2. Audit Results					
Audit result	**Certificated**	Audit grade	**A**	Audit type	**Announced**
Previous audit grade	**A**	Previous audit date	**2015-10-14**		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	9

3.Company Details

Address	't Zwarte land 13, 3925 CK Scherpenzeel		
Country	**The Netherlands**	Site Telephone Number	**+31 0 33 277 51 51**
Commercial representative Name		Email	**@vionfood.com**
Technical representative Name		Email	**@vionfood.com**

4.Company Profile

Plant size (metres square)	**<10K sq.m**	No. of employees	No. of HACCP plans **1-3**

Subcontracted processes	**Yes**
Other certificates held	ISO 9001, IKB (welfare), farming star (welfare), USDA, organic (SKAL), Chain of Custody (CoC
Regions exported to	**Europe** **North America** **Oceania** **Asia** Choose a region Choose a region
Company registration number	**NL82EG**
Major changes since last BRC audit	**Slicing line built (not operational yet), introduction of line coordinators, final check bulk lines operational, meat transport mechanisation SDP, introduction of new additional X-ray equipment.**

Company Description

VION Scherpenzeel B.V. is specialized in the deboning, cutting to specification, packing and cooling or freezing of pork, production of cured and/or smoked bacon and the production of mechanical separated meat (so called desinewed minced meat (DMM)). Only pork meat processing. Also other products are produced like pork tenderloins. The final products are based on welfare and good farming breed programmes for the pigs (GB, GF, QS and FS (farming star). The raw materials are mainly bought at slaughterhouses, which are part of the VION Group in the Europe (Netherlands, Germany). The company is part of the VION Group, which is one of the biggest meat processing and selling companies in Western Europe. Occasionally meat scraps and other pork products are also bought from meat processing non-Vion companies in The Netherlands, France and Germany. Site Scherpenzeel employs approx. people working basically in a 2-shift system from Monday to Friday, occasionally with production on Saturdays. Approx. people employed by Vion. Other employees are contracted by an in-house agency. Production capacity approx tons/year. B2B delivery, no packing of consumer products. The storage and transport of finished products is outsourced (cooled and frozen) including the deep-freezing of some products (like DMM and other products) to external cold stores. Internal cleaning of pallet boxes. Outsourced cleaning of crates. Plant size approx. 9500 m2 on ground floor over 2 buildings. Dry storage of non-meat raw materials and packaging materials in a separate building away from meat processing (together with maintenance department). HACCP-study may be categorised in 3 sub categories: pork meat, meat preparations incl. separated meat and meat products.

5.Product Characteristics

Product categories	03 - Raw prepared products (meat and vegetarian) Category Category Category Category Category
Finished product safety rationale	Temperature < 2/-18 (DMM), < 4 (meat preparations), < 7 or < -18 (other products) degrees Celsius, vacuum packaging (bacon), MAP packing (< 1,5 O2/> 98,5 % CO2), dosage nitrite (> 1 gram/litre brine/> 60 ppm on ingoing product), low Aw

High care	No	High risk	No	Ambient high care	No

Justification for area	All products have to undergo full cooking step prior to consumption. Smoking process step is not considered as a sufficient heating step.

Allergens handled on site	**None** Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	**IKB: FS (farming star/ "beter leven") and GB (= GF + welfare) and GF (good farming) + Qualität und Sicherheit (QS) + Organic (SKAL)**
Product recalls in last 12 Months	**No**
Products in production at the time of the audit	**Bacon, DMM (desinewed minced meat), seasoned diced pork and other products from pork middles.**

6.Audit Duration Details

On-site duration	**20 man hours**	Duration of production facility inspection	**10 man hours**
Reasons for deviation from typical or expected audit duration	**None**		
Next audit type selected	**Announced**		

Audit Duration per day

Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	**2016-10-17**	**9.00**	**17.00**
2	**2016-10-18**	**9.00**	**17.00**
3	**2016-10-19**	**9.00**	**13.00**

	Auditor (s) number(s)	Names and roles of others
Auditor Number		
Second Auditor Number	**N/A**	

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref clause 1.1.9) Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
– Plant Manager	X		X	X
– Quality Manager	X	X	X	X
- Manager Operations	X			X
Maintenance Assistant	X	X	X	X

- HR Manager	X		X	X
– Quality Officer	X	X	X	X
– department manager DMM		X		
Department manager 'Snijlijn'		X		
Department manager Salting/smoking/SDP		X		
Department manager "Magermetcentrale"		X		
. – Operator Goods In		X		
Shift Supervisor Expedition		X		

Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	**Clause**	**Details of non-conformity**	**Critical or Major?**	**Anticipated re-audit date**

Critical			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
01	3.6.1	Raw material product specification Pepper (supplier , 07-04-2015) does not specify limits for contaminants (like sporulating organisms) as identified by the raw material food safety risk assessment. According to	**Correction:** Most up to date specification (supplier updated in database	**Root cause:** Central Purchase Non Food department has delay in update of specifications, by more than normal updates. **Corrective action:** Update ingredient	**See attachment:** 160919 Specification 07apr2015 Verification 2016-11-07 consistency other product	2016-11-15	

		the control measure linked to risk score 3 product specifications should cover this kind of information (CP).		specifications of products supply by Vion Scherpenzeel. **Verification:** Specification (supplier , 19-sep-2016) in database **Status:** 1116. : Fully Closed.	specification with the raw material risk assessment.		
02	4.8.6	Drain hand disinfection equipment is not working properly. Water level remains in hand disinfection unit causing possible cross-contamination risks.	**Correction:** Drain directly repaired (Req-094666)	**Root cause:** Drain in the equipment was not correctly designed, highest point of drain was 5cm above connection of disinfection unit. In the unit is 5cm level of liquid. **Corrective action:** Drain correctly connected, highest level of drain is equal with connection of disinfection unit. **Verification:** On 13th of October 2016 no remaining level of liquid in unit	**See attachment:** 161013 Drain disinfection unit.pdf	2016-11-15	

				of disinfection unit. **Status:** 1116. : Fully Closed.			
03	4.9.3.3	Follow-up of broken items not consistently demonstrable in case of broken/missing items. For example missing button control panel above inspection belt "Magermet" department and damaged ceiling above cutting line 2.	**Correction:** - Directly, damaged button 'MagerMetCentrale' replaced (Req-095380) - Ceiling repaired after production. Not direct risk of product, because no possible could loose parts in the ceiling at the moment. (Req-095381)	**Root cause:** Responsibilities in relation prerequisite requirements by foremen's and department managers are not clear. Take not enough time to observe prerequisite requirements by shopfloormanagers. **Corrective action:** Week 42: Instruct department managers and foremen's their responsibility in relation prerequisite requirements and actions taken. Week 43: Support shopfloor by quality department on prerequisite requirements.	**See attachment:** 161107 Verificatie BRC punten.pdf	2016-11-15	

				Verification: Week 44: Verification Pre requisite requirements by QA department. **Status:** 1116. : Closed. Verification effectiveness during next evaluation visit.			
04	4.11.2	Current cleaning program external contractor is not fully up-to-date. According to schedule disinfectant should be used with a concentration of 3-5 % (1-3 % according to specification). Cleaning program also refers to the usage of former chemicals like and	**Correction:** Cleaning program update to actual situation.	**Root cause:** In the last revision 24th of July 2016 the used chemicals not updated. This version also was in concept. **Corrective action:** 02th of November 2016, Cleaning program update to actual situation. **Verification:** 03th of November up to date cleaning program reviewed during verification cleaning procedures. **Status:** 1116JER: Fully	**See attachment:** 161102 cleaning program.pdf	2016-11-15	

				Closed.			
05	5.2.2	Product label seasoned diced pork for the Japanese market (53940) differs from the label communicated with the customer in commercial specification 16-11-2015). Freezing date is no longer specified on the label for example.	**Correction:** Internal production specification updated with the required label.	**Root cause:** Central Masterdata department has delay in update of specifications, by more than normal updates. **Corrective action:** Update 53900 specification, version 25jul2016 for production Vion Scherenzeel by MasterData department. **Verification:** Specification 53900 updated in the specification database. **Status:** 1116. : Fully Closed.	**See attachment:** 160725 53900 .pdf 161013 Label 11okt2016 Commercial specification 2016-10-19	2016-11-15	
06	5.4.2	The vulnerability assessment for raw materials other that pork meat is based on aspects like availability, packaging, processing location, etc.	**Correction:** Not correctly explained by the auditee. When Supplier/producer GFSI certified, the supplier / raw material get ranking "low risk"	**Root cause:** Not completely explained by auditee. **Corrective action:** Procedure 'P-FOOD-	**See attachment:** 161027 Vulnerability Additives.pdf	2016-11-15	

		Although in the procedure is concluded that none of the non-meat raw materials are considered high-risk the evaluation of the aspects are not documented to support this conclusion.	immediately.	10049 Procedure Product- and procesintegrity' and vulnerability scheme reported to auditor. **Verification:** 27okt2016 Vulnerability scheme and procedure verified. **Status**: 1116. : Fully Closed. Central procedure VION group. FS22000 scheme does not cover product integrity. Most critical non-meat ingredients for Vion Scherpenzeel are the organic herbs/spices also supplied by ! The Netherlands (FS22000 certified). Also verification SKAL-certificate (organic) demonstrable on top of GFSI-certificate.			
07	5.4.6	During the audit of the "Magermet centrale" it was	**Correction:** Test and calculate the amount	**Root cause:** Change-over was part	**See attachment:** 161109 Verificatie	2016-11-15	

		told that during the change-over from products with different welfare claims (GB to FS, Farming Star) the production line should be flushed with a meat quantity to separate production batches from each other and to assure product authenticity. This way of working is not specified in the concerning procedure SPZ-NL-10025 (31-08-2016).	of 'product in process' during change-over welfare standards.	of good manufacturing Practice, not exactly described. **Corrective action:** Amount of product in process during change-over welfare standard added to Procedure 'P-SPZ-NL-10025 Kanalisatie' **Verification:** Procedure 'P-SPZ-NL-10025 Kanalisatie' eprooved on 09-Nov-2016 **Status:** 1116 : Fully Closed.	Overgang kwaliteitslijn MMC_DMM.pdf		
08	5.5.2	During the audit tour several orange coloured plastic bags "dolavs" were damaged posing contamination risk to the product.	**Correction:** To prevent contamination of product, damaged orange liners replaced by new dolav liners.	**Root cause:** The used orange dolav liners are made of lower film quality instead of blue dolav liner (size, material, thickness). **Corrective action:** Only use of Orange dolav liners made from	**See attachment:** 161107 Dolav liner Orange.pdf	2016-11-15	

				same (size, material, thickness).specification as blue dolav liner **Verification:** On the 07th of November verified used orange dolav liners. Specification and free from damages during use. **Status:** 1116 : Fully Closed			
09	7.1.4	Shift supervisor "Magermet" department is not able to explain that in case of a malfunctioning metal detector QA should be informed to quarantine the production quantity back to the last successful metal detector test. The metal detector is not consistently tested using the samples together with the product.	**Correction:** Shift supervisor immediately reinstructed subject 'Control of Metal detector'.	**Root cause:** The effectiveness of instruction 'control metal detector' in practice not demonstrable. **Corrective action:** Shift supervisor immediately reinstructed subject 'Control of Metal detector'. Effectiveness of instruction in practice checked by checklist. **Verification:** On 21st of October	**See attachment:** 161014 Training record.pdf 161019 Praktijktest 'controle metaaldetector'.pdf	2016-11-15	

				2016 effectiveness of instruction checked in practice. **Status:** 1116. Fully Closed			

Comments on non-conformities

Voluntary Modules Non-Conformity Summary Sheet

Critical			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

Policy documented in P-SPZ-NL-10158 (22-04-2014) and signed off by the Plant Manager.

Policy deployment using the X-matrix specifying the interaction between objectives, responsibilities, indicators, etc. Evaluation status objectives on a weekly basis. Objectives (e.g. 20 % complaint reduction) and ` projects defined. Also focus on reduction of foreign material contamination risks.

Annual management review combined with HACCP system verification. Demonstrable for period 07-2015 – 06-2016 which covers the required topics. No major issues reported during internal and external audits (. (findings)), CoC, etc.) . System audit held by Dutch authorities (NVwA) on 2016-08-03 (1 warming reported). Food safety complaint level OPCO decreased but foreign body complaint not yet below target set. Investments carried out are: X-ray, final inspection line, mechanisation , etc.. Most important complaint categories: contamination with dirt/foreign materials/glass + hard plastic, high temperatures, label issues and the cutting specifications which caused an increase of quality related complaints. Microbiologic monitoring program shows -Salmonella positive incidents (withdrawal from warehouse, report to NVwA and re-destination to production of meat product ( )) and Listeria positive samples (meat preparations, DMM). All product have to be heated prior to consumption. Follow-up by management. Improvement of food safety and quality management awareness reported as an recommendation based on the management review. Several examples linked to this recommendation were shown during the audit like start-up TPM improvement projects, LEAN-training, etc.

Meeting structure in place like the management team meeting but also the quality meeting which covers quality- and food safety aspects. Monitoring of applicable legislation EU and outside by HQ Vion Boxtel (reviewed meeting minutes 2016-10-18+19). Digital version of the BRC7 standard available. Subscription to BRC Participate. For example FSMA information has been reviewed.

All 10 minorNC's are fully closed, including the minorNC's with status closed.

1.2 Organisational structure, responsibilities and management authority

Organisational structure documented in P-SPZ.NL-10092 (2016-078-07). Experienced management team.

Details of non-applicable clauses with justification

Clause reference	Justification

2 The Food Safety Plan – HACCP

HACCP-team members: Plant manager (team leader), QA-manager, Production Manager supported by Maintenance Manager, Manager F&A, Facility, etc. where necessary. Competent team of people working for many years in the meat processing industry. P-FOOD-10013 (2014-11-14).

Setup of PRP program centrally by HQ VION Boxtel (process control plan, P-SPZ-NL.10067, 12015-11-05). Production specification information used as input for the hazard identification/risk assessment. Product suitable for delivery B2B and consumption general consumer groups but also vulnerable consumer groups as meat product are also supplied to infant food production companies. No claims made regarding food safety aspects. P-VION-10000 (2014-09-19).

Flow diagrams demonstrable as reviewed for seasoned diced pork (SDP) (PRO-SPZ-NL-10168 (2014-10-06). Annual verification of flow charts as reported in the combined HACCP-system verification/management review. Verification details of flowcharts are recorded in the document control system ( ). No reworking or recycling identified. Freezing (of naked product), transport and cold storage (incl. metal detection) are subcontracted and outsourced processes.

Relevant information collected, maintained, documented and updated by VION HQ Boxtel (EU and outside EU like US or Japan).

Reviewed/assessed:

- Export protocol (RI-194, NVwA, 2015-06-23) related to export to Japan (sealing, verification meat origin, etc.).
- Risk assessment SDP (epspecially concerning recently installed new cutting equipment, transport screws and new additional X-ray-device).
- Validation of changes to SDP process (project management checklist incl. quality/food safety, processing, etc.). Verified cleaning program changes (week 44-2016), maintenance program and verifciation product temperature effect due to mechanical transport/cutting process steps (checklist FTR, F-NL-FOOD 10078).

Hazard identification/risk assessment setup centrally by HQ VION Boxtel based. Risk calculation based on likelihood occurrence and severity of effects (3x3-matrix, P-VION-10000, 29-09-2014) which has to be adapted by the production locations like Scherpenzeel. The generic risk assessment has to be adapted to the local processes and buildings. No allergens on site. Output risk assessment will lead to CCP, CP (PRP control measure) depending on the risk score.

1 CCP identified concerning the temperature of the incoming middles. Critical limits applied: < 7 degrees Celsius (legal EU-limit), < 6 degrees Celsius (raw materials for Japan and < 6 degrees Celsius (other product). When temperature is between action limit and critical limit it is allowed to receive the batch but must be quarantined (QA/management must be informed). Above critical limit batch must be rejected and it is not allowed to receive the batch. Other CP's (food safety control measures at PRP-level) identified (amongst several others):

- Product contamination (product own/foreign materials – slaughter/handling/lubricants/pest

control/personal hygiene/etc.);

- Control contamination with condensed water from cooling systems;
- Temperature control during processing (magermet: < 6 degrees Celsius);
- Hygiene recipients (crates, pallet boxes, etc.);
- Procurement raw materials according to specification (incl. additives);
- Control product age (< 5 days after slaugter, according to EU regulation 853);
- Control printing shelf life date;
- Control MAP packing process (< 1,5 O2);
- Control dosage nitrite as preservative in brine injection (> 60-150 ppm ingoing product);
- Control vacuum packed products (visual inspection);
- Control injection brine solution (bacon);
- Control cooling down after smoking process (< 24 hours, < 7 degrees);
- Control temperature transportation;
- Control metal contamination (knife integrity verifiation, metal detection);
- Control contamination other foreign materials (X-ray);
- Control temperature at load-out (< 2 degrees Celsius DMM, < 4 degrees Celsius meat preparations, < -18 degrees Celsius frozen products)

Annual verification of the HACCP-system combined with management review (07-2015 – 06-2016). Internal audit program. Process information record sheets are verified on a daily basis by shift management.

Details of non-applicable clauses with justification

Clause reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

-system used for document control. Documents available to personnel using the intranet.

3.2 Documentation control

Authorisation of documents based on system functionality. Some documents available in relevant documents as several employees of different origin are working for the company.

3.3 Record completion and maintenance

Records are archived for 5 years according to procedure. Maximum product shelf-life applied is 2 years.

3.4 Internal audit

Audit management by the VION system. There are schedules of internal audit against documented procedures, carried out by trained auditors (VION auditor pool). Twice a year the production site and involved departments are audited. Both announced and unannounced internal audit carried out. Procedure 'interne audits' (P-VION-10011). Recording of findings reported on a central list.

On a daily basis so called pre-SSOP assessments are carried out in every production department. These assessments are used to identify and solve any non-conformity related to hygiene and/or state of repair of processing equipment, processing/storage areas and buildings. Reviewed examples of pre-SSOP's related to the vertical audit (SDP).

Reviewed/assessed:

- Internal audit 2016-09-29 ( ).

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw materials and packaging

Risk identification/risk assessment related to raw materials setup centrally by HQ VION Boxtel resulting in product specifications specifying relevant aspects to quality and food safety (CP). Approval of suppliers based on GFSI-certification. All suppliers of packaging have to be approved by the central VION office entered into the system ( ) before they are allowed to deliver. No questionnaires used. Some additives from the brine delivered by trading companies.

Reviewed/assessed:

- Risk assessment related to pepper used for SDP Japan (pesticides, Salmonella, sporulating organisms like Clostridia, PCB's, Listeria M). IFS Food certification supplier (2017-01-10).
- GFSI-certifcation of porc meat supplier (F) (3 production sites BRC Food certified).
- Smoke aroma. (GFSI-certification).
- BRC Food certification of (D) producing the nitrite/nitrate salt supplied by trading compnay .

3.5.2 Raw material and packaging acceptance and monitoring procedures

Procedure P-SPZ-10030 (31-01-2014). Temperature control incoming meat batches (pork middles, other pork meat parts) is a CCP. Identification of IP-status pork middles by coloured labelling (organic = green, farming star = orange, GB/GF/QS = blue). Also slaughterhouse specification by coloured labelling (determining further processing according to costumer specification). Verification of slaughter date and origin at reception of meat batches. Meat guiding documents are verified by the gate keeper and must be approved before trucks are unloaded. Document must show the recognition for export countries (like Japan for SDP). Overview available showing which slaughterhouse is recognised to supply meat for export countries). Other ingredients and packaging materials are received at the dry warehouse in a separate building. Visual inspection.

Assessed/reviewed:

- Delivery pork middles Vion Boxtel (234700, 208674, 208676).
- Supply of pepper batches to SDP department (stainless steel container). FIFO/FEFO.
- Reception of pepper and packaging materials ( ).

3.5.3 Management of suppliers of services

Services suppliers identified: pest control ( ), laundry ( ), maintenance (several contractors involved), transport (mainly , controlled by VION), cold storage (final products), laboratory services, catering, crate washing ( ), waste.

Reviewed/assessed:

- Cleaning of hand towel roll systems (, validation cleaning process based on Enterococcus Faecium, 2012-11-13. Contract (2013-02-16). Certex certification (2018-09-15).
- Pest control (, 2016-07-24).
- Cleaning (, 2016-04-20).

3.5.4 Management of outsourced processing and packing

Overview available of approved external cold stores specifying there legal recognition (EU-number and scope), applicable (GFSI-)certificates (F-SPZ-NL-10110, 15-11-11). Cold stores involved in freezing (both naked products and packed products) but also metal detection. GFSI-certification and CoC (chain of custody) certification required for cold stores. Based on the risk profile the cold stores are audited by Vion periodically. Contracts refer to relevant Vion procedures.

Reviewed/assessed:

- : BRC Food + CoC. Vion audit (2015-12-16). Contract (2012-09-28).

3.6 Specifications

Control of specification by VION HQ Boxtel. Specifications must cover relevant aspects concerning quality and food safety (CP, PRP-control measure).

Reviewed:

- Final Product specification ! (2014-12-18).
- Commercial specification SDP (seasoned diced porc, 2016-11-16).
- Raw material specifciation Pepper ( ) (2015-04-07).
- Raw material specification (backs, 2016-10-17) specifying cutting specifcations, temperature, legal requirements, transport, labelling, microbiological limits, etc.
- Internal raw material specification (Shoulders 2D, Japan) (2012-06-21).
- Product specification ( ). Output X-ray SDP-department.

MinorNC: Raw material product specification Pepper (supplier , , 07-04-2015) does not specify limits for contaminants (like sporulating organisms) as identified by the raw material food safety risk assessment. According to the control measure linked to risk score 3 product specifications should cover this kind of information (CP).

3.7 Corrective and preventive actions

Reviewed corrective actions related to internal audits, objectives, microbiological hygiene monitoring, environmental monitoring, product monitoring, etc. Different document and systems are used, no central recording of PDCA-cycle concerning deviations/non-conformances.

3.8 Control of non-conforming product

Procedure P.SPZ-NL-10010. Identification of non-conforming product using a red label. Also a red banner is used to for identification of hooks with meat in case of non-conformances (in cooling cell). Supervisor and production manager are responsible for use or disposal of concerning products (printed on the label used for non-conforming products).

3.9 Traceability

Hooks with meat received are traceable by the labels which have to verified at reception of the batches. Traceability raw materials by day. Other raw materials are received by internal services department managing the warehouse where raw materials other than meat and packaging materials are stored. Batch information of non-meat raw materials and packaging materials are recorded and linked to a week number. Internal service department is responsible for distribution of raw materials and packaging materials to the processes. As the change-over from one to another batch code of raw material (for example pepper) is not recorded consistently at the processing line this procedure may lead to a less accurate traceability level. Final product traceability by recording production and for some products additional batch information on the packing label.

Traceability test carried out related to batch SDP (art. Nr. 53900, order number Vion 237235). Information traceability test was available within 4 hours.

Last internal traceability test was carried out as part of an internal audit in 2016-06-05. Mass balance check is carried out on a daily basis to demonstrate the segregation of IP-product as verified during the audit for Farming Star DMM. These mass-balance checks are carried out at process level. Last integral mass-balance check over all processes within the plan carried out CoC-audit in 2015 (FS). 98 % Accuracy reported.

All suppliers have to be GFSI-certified.

3.10 Complaint handling

Complaints are received and any complaints which are considered to be attributable to the process/ product are communicated and investigated. All complaints are trended and reviewed. software is used for complaints. Complaints are discussed in the Level 1 meetings (= Tier meeting). Food safety complaint level OPCO decreased but foreign body complaint not yet below target set. Investments to reduce product contamination with foreign materials carried out are: X-ray, final inspection line, mechanisation SDP, etc.. Most important complaint categories: contamination with dirt/foreign materials/glass + hard plastic, high temperatures, label issues and the cutting specifications which caused an increase of quality related complaints.

3.11 Management of incidents, product withdrawal and product recall

There is a recall procedure from the VION concern which covers the process and which is applicable for all operations. Last recall test reported 2016-05-06. No actual recalls in 2016 but batches meat preparation were withdrawn from the cold stores due to presence of Salmonella based on the microbiological product monitoring program. This was reported to the Dutch authorities (NVwA). Concerning batches were and will be redirected to Vion company to be reprocessed to (heated) meat products.

3.12 Customer focus and communication

Specific customer requirements are translated into process specifications. Verified the process specification for SDP (seasoned diced pork) for the Japanese market (art. Nr 53900). Process settings (cutting specifications, fat content. X-ray settings, etc.) were properly implemented to comply with product specifications.

Details of non-applicable clauses with justification

Clause reference	Justification

4. Site standards

4.1 External standards

The site has been designed and constructed for its activities at an industrial area. There are no local activities that are expected to have an adverse effect on the activities under scope. The maintenance department and storage of raw materials and packaging materials is located in a separate building across the street. Site area is fully paved.

4.2 Security

Site fully fenced and 24 hour security in place. Site area is shared with another company. Entrance to the building using badges. Verification of issue and return of badges, especially for temporary workers. Not returned or missing badges will be blocked to prevent uncontrolled access to the production- and storage facilities. Laser detection system with camera support installed around the main production building to warn production management in case of unexpected activity around the building. Bulk storage tank for salt is fenced and locked. Raw materials and packaging materials warehouse has to be locked manually.

Porter present at entrance point trucks. Visitor reporting system implemented in the office building. Site entrance close to the office building is closed outside office hours (only entrance to the site after reporting at the porters lodge).

Meat processing company recognized by the Dutch authorities (NVwA) and approved according to EU-legislation (NL 82 EG).

4.3 Layout, product flow and segregation

The production and storage zones have been defined and based on a risk assessment all zones are categorized as low risk areas. All products have to undergo a full cooking step prior to consumption. Site map demonstrable specifying routing of personnel, materials, etc. (P-SPZ-NL-10159, 2015-10-09). No specific risks identified due to product flow across the building. Crate-washing near expedition area but segregated. Production lines are located in fully or semi-separated rooms (cutting/deboning, DMM, SDP, bacon, spare-ribs, "magermet"). Separate maintenance workshop. Truck drivers have to report at porters lodge and in the expedition area afterwards (hygiene corridor available). Visitors and contractors are instructed prior to entering production- and storage facilities.

During the building of the new slicing department near the SDP-processing line (internal) production areas were properly segregated.

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Walls, floors and ceilings are finished, suitable and maintained. Limited use of process water and manual cleaning. Sufficient drain points. External doors are close-fitting. Lighting and windows are protected where they pose a risk to the product. Pre-SSOP inspections prior to production incl. checks on status breakable items. Control of cooler blocks hanging around the building is a CP (inspection (pre SSOP),

periodic cleaning/inspection/maintenance) to prevent condensed water contaminating the product.

4.5 Utilities – water, ice, air and other gases

All utilities for water, cooling water and compressed air are covered by the maintenance system.

Both water from the mains and well water are used. Water streams are mixed up. Well water filter installed which is inspected every week as part of the maintenance program. Water used for brine is only coming from the mains (no well water applied). Well water quality is monitored as required by law (4x/year). A water distribution plan is available. Sampling tap point (water supply salt silo + "slibsilo" (latest point of distribution) on a quarterly basis.

Compressed air used for drying of equipment after cleaning. Food grade oil applied. Maintenance air compressors (4) by contractor . Monitoring of the air compressors also part of the maintenance program (water-/oil separation, drying, etc.). Filters installed in the air supply and maintained by Daily inspection of any oil leakage in the compressed air as part of the pre-SSOP inspections (CP). Also inspection and maintenance (incl. cleaning and anti-fungal treatment of the cooler blocks) is a CP.

CO2 used for MAP-packing and cooling (direct injection) is suitable for food use.

4.6 Equipment

Equipment designed for meat processing industry. Mainly stainless steel equipment.

4.7 Maintenance

Maintenance management system based on system. If possible any maintenance activities are clustered and executed every week on Saturday outside production hours. Communication to production officer to ensure cleaning prior to start-up to prevent contamination. Pre-SSOP checklist are used to record en confirm cleaning where necessary. Maintenance contractor instruction demonstrable.

Maintenance workshop inside the production building. Maintenance activities causing contamination risks carried only at the first floor. Separate storage room lubricants. Only green labelled lubricants are food grade and suitable for food safety critical applications. Only entrance to the maintenance workshop using a batch. Only pre-organised maintenance suitcases are allowed to be used inside production- and storage facilities.

Contractor receive the external hygiene instruction (06-2015).

Reviewed/assessed:

- Maintenance SDP line (Cutting equipment transport screws, X-ray-device). As the SDP-line was recently changed the maintenance program still has to commence but the new equipment is covered by the maintenance management program specifying task to prevent quality- and food safety issues. Hygiene instruction 3 associates from . demonstrable.
- Repair of ceiling by contractor

4.8 Staff facilities

Central suitable staff facilities for both internal and external employees. Lockers available for private clothing and items. No storage of protective clothing in the lockers except for protective shoes. Central issue of protective clothing. Boot wash installed at the entrance to production facilities. Direct access to production facilities. Also personally issued body protection (worn underneath the clean protective clothing) may be stored in the locker. Hygiene corridor at the entrance of production facilities. Toilets are located near the changing facilities. Closed smoking room in the canteen area.

MinorNC: Drain hand disinfection equipment is not working properly. Water level remains in hand disinfection unit causing possible cross-contamination risks.

4.9 Chemical and physical product contamination control

Raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

Approved chemical list demonstrable. Separate storage for cleaning chemicals which can only be accessed using a batch. MSDS and products specifications available. Documentation available for disinfectant

4.9.2 Metal control

Knifes are issued to employees by numbered **sets** and changed every break for cleaning. Integrity check of knives not returned every break are covered by daily pre-SSOP inspections.

Inspections of cutting blades and needles carried out during breaks (for example SDP department must be inspected during first break and cleaned during second break). Breakage of injection needles bacon processing department is considered very unlikely.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Quarterly glass audits are carried out. Reviewed inspection reports Q2 and Q3 2016. Missing or broken items are reported and directly linked to a maintenance task. Periodic verification of maintenance program. Daily verification of breakable items during pre-SSOP inspections. Procedure management broken items complies with requirements.

MinorNC: Follow-up of broken items not consistently demonstrable in case of broken/missing items. For example missing button control panel above inspection belt "Magermet" department and damaged ceiling above cutting line 2.

4.9.4 Products packed into glass or other brittle containers

Not applicable.

4.9.5 Wood

No wood is allowed at the production departments, except the wood pieces for smoking bacon. These are stored and used separately.

4.10 Foreign-body detection and removal equipment

4.10.1 Foreign-body detection and removal equipment

Metal detection (products), sieves (injection fluid, water), X-ray (products) applied. Vision camera system not validated to remove foreign materials (control of quality aspects. Also during visual inspection at specific lines (for example SDP) foreign materials found are collected and evaluated. Both foreign and product own materials (like bone residues due to improper cutting) are presented to supplier when necessary.

Testing metal detection and X-ray detection using methods and samples compliant with commercial specification SDP (2015-11-16) as verified during the audit.

4.10.2 Filters and sieves

Filters used to control the hygiene of the brine to prevent any obstruction of injection needles (with the risk of insufficient iniection at certain areas of the meat pieces). Cleaning as part of the cleaning program executed by . Assembling of the micro-sieve of the injection equipment by the team leader after hygiene inspection as recorded on the pre-SSOP-list as reviewed during the audit.

Well water filter installed is inspected every week as part of the maintenance program.

4.10.3 Metal detectors and X-ray equipment

Metal detectors installed at:

- Packing line JK/VM12/VM14/"magermet"/smoking process: 5,0 mm Fe + 6,0 mm non-Fe + 6,35 mm SS (check start-up, every 3 hours and end of production);
- Salting process 1 and 2: 5,0 mm Fe + 6,0 mm non-Fe + 7,94 mm SS (check start-up, every 3 hours and end of production);
- Spare-rib process line: 3,5 mm Fe + 4,5 mm non-Fe + 6,00 mm SS (check start-up, every 3 hours and end of production);
- SDP/China lines: 3,5 mm Fe + 3,0 mm non-Fe + 4,5 mm SS (check start-up, every 3 hours and end of production);
- DMM process line: 6,00 mm SS (check start-up, every 3 hours and end of production). Metal detector used to protect processing equipment.

Also metal detection applied by contractor (frozen storage). Metal detector functioning is checked using sample sticks. Both belt stop systems and rejection devices used depending on the packaging size. Procedure metal detection documented on registration form F-SPZ-NL-10072.

2 X-ray systems installed at SDP packing line (incl. rejection valve system). Verification proper functioning of the equipment by testing samples at start-up, every 3 hours and at the end of production:

- 2,381 mm glas;
- 2,381 mm ceramic;
- 1,00 mm metal.

Verification proper functioning of recently installed X-ray system using following sample sizes. Test strips contain different samples sizes. Therefore the X-ray detector has to detect at least 4 objects on each strip (which equals the minimum samples specified below):

- 0,8 mm SS bal;
- 0,4 mm SS wire;

- 2,0 mm glas;
- and 2,0 mm ceramic.

4.10.4 Magnets

Not applicable.

4.10.5 Optical sorting equipment

Vision camera system installed at spare-rib packing line. System used for monitoring quality aspects (size), not foreign materials. System settings are controlled by recipes which correspond with the customer specific requirements.

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

Not applicable.

4.11 Housekeeping and hygiene

Both equipment- and facility cleaning subcontracted to . Cleaning program demonstrable including working instructions for specific equipment (2016-07-17). Setup cleaning program changed SDP process must be finished in week 44 as agreed with . Monitoring hygiene status by daily pre-SSOP (reviewed 2016-10-10->14). Cleaning materials are also part of the cleaning program.

Verification cleaning activities by pre-SSOP-inspection every day at every department carried out by team leaders. Agar sampling program (. Results 2016 show controlled cleaning. Also microbiological monitoring of crate cleaning process (reviewed results 2016-10-13, 2016-07-07 and 2016-05-11). Chemical residue testing using pH-strips. Listeria swabs taken on a quarterly basis. After a period of time again repetitive positive results found at deboning-/cutting line 2. Has the attention of site management but root cause has not been found yet (consideration same setup of belt system like line 1).

Calibration of chemical dosage cleaning equipment on a quarterly basis. Reviewed report 2016-09-15 and 2016-04-15.

MinorNC: Current cleaning program external contractor is not fully up-to-date. According to schedule disinfectant ! should be used with a concentration of 3-5 % (1-3 % according to specification). Cleaning program also refers to the usage of former chemicals like and

4.11.7 Cleaning-in-place (CIP)

Not applicable.

4.12 Waste / waste disposal

Correct collection and identification was demonstrated. Dispatch of cat. 2 and cat. 3 materials to authorized processing companies ( ). Other by-product (like bones) supplied to authorized processing companies for human consumption ( ). Other waste stored on-site and collected separately by van

4.13 Management of surplus food and products for animal feed

Not applicable.

4.14 Pest Control

Pest control outsourced to contractor (recent changeover from using the digital web portal. 8 Visits/year. Electric insect killer lamps are maintained on a quarterly basis. Focus on rodents and flying/crawling insects. Application on non-tox detection equipment inside and outside the production and storage facilities as well. No issues reported in 2015/2016, except for detection of mice in technical service areas and offices. Proper follow-up of recommendations by the pest controller as demonstrable by dashboard on the website. In-depth inspection carried out by contractor on an annual basis.

4.15 Storage facilities

At the production facility limited cold storage available. Temperatures control system implemented (frozen and cooled) including temperature alarm settings. System linked to contractor alarm desk ( ) forwarding alarms to Vion officers when necessary. Reviewed temperature logging of SDP production area and expedition area.

External storage is applied for e.g. DMM, bacon and SDP. DMM is transported at a temperature below 2 degrees and is then frozen to below -18 degrees by an external cold store according to legislative requirements. A separate building is applied for the storage of packaging and other raw materials. No return of part-used packaging materials to this warehouse. No outside storage, except for dirty crates. Warehouse/cold store contractors are
and

4.16 Dispatch and transport

Dispatch and release of products is based on temperature verification (CP). Transport mainly subcontracted to , a Vion transport company, which is BRC S/D certified.. Other approved logistic partners are listed. Contracts, managed by the logistic / supply chain department at the corporate VION organisation covering the requirements of the BRC standard related to transport. Transport is organised and scheduled by the Service desk. They are only using approved transport and storage contractors. Trucks and reefer containers are inspected for hygiene and temperature before loading. Results of this inspection are recorded at the CP control forms. Trailers may be pre-loaded and parked on the Vion Scherpenzeel site area. Remote monitoring of cooling equipment by logistic contractor

Reviewed/assessed:

- Logistic partner BRC S/D-certification (2016-12-19).

Details of non-applicable clauses with justification

Clause reference	Justification
4.9.4	No application of brittle packaging materials.

4.10.4	No magnets applied to control/prevent product contamination. Method not suitable for this sector.
4.10.6	No application of containers for packing products.
4.11.7	No CIP cleaning applied. Brine storage tanks are cleaned using manual flushing programs.
4.13	No surplus product supplied to charities. By-products are supplied to authorised food business operators or authorised waste collection companies (cat. 2/3 material) following legal EU-requirements.

5. Product control

5.1 Product design/development

No new product developments identified. The product development process is managed centrally within the VION Food organisation. Any new process validation is carried out by Vion HQ Boxtel as part of project management process. Local HACCP-team will be involved in case of new product introductions or new or changed processes. Site Scherpenzeel is an allergen-free site. New product introduction is expected when the new slicing line will be operational. Production trails and shelf life verification will be part of the product development procedure.

5.2 Product labelling

Verification of shelf life period recorded on labelling based on CP. No full automatic labelling of packed product identified. No packing of consumer products (only B2B). No pre-printed labels used. Product labels are printed based on article numbers and labels have to be printed per packed unit. No functional product claims made. No allergens identified on-site. Labelling product for EU-market following EU-legislation and any additional customer requirement. Following Vion central procedure labelling for markets outside EU approved by Sales (HQ Vion) after evaluated with the customer. Reviewed labelling SDP for Japanese market (53900) by comparison internal labelling system and label on the commercial specification as communicated with the customer.

MinorNC: Product label seasoned diced pork for the Japanese market (53940) differs from the label communicated with the customer in commercial specification 16-11-2015). Freezing date is no longer specified on the label for example.

5.3 Management of allergens

No allergens on-site. Verification specification non-meat raw materials is part of the supplier approval process.

5.4 Product authenticity, claims and chain of custody

Vulnerability assessment based on central procedure P-...-10049 (2016-08-30). Local assessment must be carried out base on this procedure (P-SPZ-NL-10174, 2016-06-21). Basically local vulnerability

assessment based on evaluation of raw material characteristics, supplier evaluation and logistic services). Raw material risks are considered low as products can be easily recognised as animal parts. Product mainly supplied by Vion companies. Procurement of meat part from external companies and external logistic services (especially when product are unpacked, for example for freezing) are considered high risks. CoC-audit program implemented for logistic service providers depending on the company risk profile. Logistic service providers have to be GFSI-certified and CoC-certified as well. Reviewed for (last audit December 2015, BRC Food).

Segregation and correct identification is established for several animal welfare categories (so called quality lines):

- organic pork (SKAL certified). Identification: green label, last number art. Nr. = 7;
- Farming star ("beter leven"). Identification: orange label, last number art. Nr. = 5;
- GB, (= good farming including welfare requirements for UK clients). Identification: blue label, last number art. Nr. = 6;
- GF (IKB certified). Identification: blue label, last number art. Nr. = 3;
- QS (qualität und Sicherheit, for German market. The organisation. Identification: blue label, last number art. Nr. = 4/8.

Certification of GF, GB by certification body and FS by . Reviewed last audit report (2016-07-14, no serious issues reported). All the meat products are produced based on EG 82 approval number, incl. the regular meat (called TS "standard"). Recently Vion Scherpenzeel is certified according to the CoC (Chain Of Custody) scheme. Risk assessment and execution of mass balance exercises are scheme requirements. Daily verification of mass-balance FS at process level (no integral check) as verified for the DMM process is accepted by the certification body (FS scheme requires full monthly mass-balance test). Mass balances are made on a daily basis for all quality lines.

During the audit is checked how the status of quality lines is verified and segregated at the intake department and several production departments ("magermet", cutting/deboning, DMM, etc.) like the labelling of meat hooks, the identification of product lines, the production sequence (starting with high quality lines followed by lower quality lines), colour coding of recipients (coloured liners) to prevent exchange of meat categorised in different quality lines, etc.

Procedures are implemented concerning the verification of the quality line and how to downgrade the quality lines as generally the demand of certain quality lines is lower than the availability of meat categorized in higher quality lines. Downgrading quality lines is the responsibility of trained and qualified personnel. The downgrading is allowed following the sequence: FS -> GB-> GF -> QS -> ST. At the MSM department also organic categorised meat can be downgraded. Upgrading is not allowed.

Vulnerability assessment for non-meat raw materials covered by the procedures and risk calculation based on a few factors like product characteristics, packaging materials, origin, product availability, etc. No high-risk raw materials identified for site Scherpenzeel.

Also countries of destination can have their own requirements (like US/Canada (USDA), Korea, Japan, etc.). Dutch authorities (NVWA) issue certificates on batch level following export protocols.

MinorNC: The vulnerability assessment for raw materials other that pork meat is based on aspects like availability, packaging, processing location, etc. Although in the procedure is concluded that none of the non-meat raw materials are considered high-risk the evaluation of the aspects are not documented to support this conclusion.

MinorNC: During the audit of the "Magermet centrale" it was told that during the change-over from products with different welfare claims (GB to FS, Farming Star) the production line should be flushed with

a meat quantity to separate production batches from each other and to assure product authenticity. This wat of working is not specified in the concerning procedure SPZ-NL-10025 (31-08-2016).

5.5 Product packaging

A colour system for dolav bags is in use for some clients/ products (purple for Japan, orange for FS). For others mostly blue is used in dolavs. Packaging materials are stored separately from production materials and part used packaging is covered prior to returning to the storage area. Packaging materials have to comply with EU 1935/2004 (specification review/approval process). Reviewed primary packaging material (bag) for SDP (DoC 2016-05-12).

MinorNC: During the audit tour several orange coloured plastic bags "dolavs" were damaged posing contamination risk to the product.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Product monitoring based on EU Re 2073 and interpretation guideline (infoblad issued by the Dutch authorities, NVwA) laid down in procedure P-FOOD-10008 (2015-11-13). Both product criteria and process hygiene criteria set by legislation are translated to the monitoring program as reviewed based on sampling.

Salmonella positive products found in 2016 (batches, 2016-07-14, 2016-07-01 and 2016-09-05) which resulted in withdrawal of product from cold stores for re-destination to Vion company Enebe to be reprocesses in heated meat products. Confirmation of Dutch authorities demonstrable that they have been informed according to legal requirements (for example 2016-07-08). Listeria positive samples found during monitoring of cutting line 2 in 2016 (internal requirement). All products produced by site Scherpenzeel have to be fully heated prior to consumption.

DMM type 3 (according to EU Re 853/3004) to be used for meat product to be heated prior to consumption. Positive release on Salmonella possible when requested by customer to be able to use the DMM for other products. Also calcium monitoring for DMM demonstrable.

Shelf life testing based on TPC en Enterobacteriaceae. Last shelf life test frozen product (like SDP) carried out in 2010 following Vion procedures. Currently shelf life test SDP is running and will end in 2017.

Physical/chemical product monitoring as part of process control, for example meat part size and fat content for SDP.

Assessed/reviewed:

- Microbiological monitoring of SDP (TPC, E. Coli (hygiene monitoring), Salmonella, Listeria). Weekly samplnig (n=5, different production days).
- Chemical/physical monitoring of SDP (process controls): part size (10 mm) and fat content (< 20 %).

5.6.2 Laboratory testing

No internal lab. Microbiological analysis carried out by ISO 17025 accredited lab (accreditation number L132).

5.7 Product release

No positive release. Product temperature verification prior to dispatch required. For some destination countries some additional requirements are applicable. DMM type 3 (according to EU Re 853/3004) to be used for meat product to be heated prior to consumption. Positive release on Salmonella possible when requested by customer to be able to use the DMM for other products.

Details of non-applicable clauses with justification

Clause reference	Justification

6. Process control

6.1 Control of operations

Multi moment measurement (MMM) system implemented. Team leader take a predefined number of sample during their shift and compare the processed product to reference pictures to verify compliance to customer or internal specifications. Results are reported on score-boards. In case of scores exceeding predefined limits containment actions and where necessary corrective actions have to be taken.

Communication structure at different levels. Daily tier 1 production meeting covering quality performance.

Recipes identified at spare-rib department and brine processing (injection). Pork middles received are labelled to be able their specification for further processing (destination of batches linked to internal or customer specifications).

CCP (temperature verification reception of goods) and several CP's regarding food safety control implemented. Temperature control system in place for monitoring temperature processing, packing and storage areas.

Assessed/reviewed:

- Internal inspection backs bacon production;
- Brine temperature control (drip, product temperature);
- Monitoring brine injection volumes bacon production;
- Pressure DMM processing based on the calcium monitoring program.;
- Fatcontent monitoring (magermet + SDP).

6.2 Labelling and pack control

Verification of shelf life period recorded on labelling based on CP. No full automatic labelling of packed product identified. No packing of consumer products (only B2B). Product labels are printed based on article numbers and labels have to be printed per packed unit. Pre-printed labels not used are thrown away. No pre-printed labelling stored. No vision system installed for label verification. Pre-SSOP checks carried out every day prior to packing of products. During packing frequent verification of labelling.

Reviewed/assessed:

- Verification labelling 65963 (Frozen Porc Belly).

6.3 Quantity, weight, volume and number control

No packing of consumer products. Weighing of products using calibrated scales.

6.4 Calibration and control of measuring and monitoring devices

Calibration of equipment part of the maintenance program. Manual equipment calibrated by QA-department. No reference equipment identified. Weights for internal verification of scales (not used for determination of the final trade weight) used. Verification accuracy temperature measurement devices by measuring ice and boiling water. Fat analyser calibrated on a daily basis using reference sample provided by supplier ("magermet" department and SDP). Reviewed/assessed calibration of handheld thermometers (18-11-2016).

Details of non-applicable clauses with justification

Clause reference	Justification

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

Introduction training available in several languages. Training held for both internal and external workers in an instruction room. Examination introduction training afterwards. After introduction training department supervisor must identify and request the required training to HR-department. Additional training are not followed by examination. Shift supervisors/department manager have to report if training appears to be not effective during training on the job. Non-conformances (linked to) in behaviour are reported en evaluated in the management review but does not cover the complete training program. HR process checklist used to control the process steps concerning the introduction of any new employee. Overview of training provided to employees demonstrable and updated every week. Personal development program in place for internal associates.

Contractors receive an external hygiene instruction (06-2015).

Reviewed/assessed:

- External instruction of maintenance contractor (2014/2015)
- POP:
- Training file:
  - ("magermet" department). Metal detection.
  - ,SDP). 2016-10-11 (X-ray).

o (SDP). 2016-10-04 (X-ray).

MinorNC: Shift supervisor "Magermet" department is not able to explain that in case of a malfunctioning metal detector QA should be informed to quarantine the production quantity back to the last successful metal detector test. The metal detector is not consistently tested using the samples together with the product.

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

All personnel are instructed about the documented hygiene standard prior to commencing work, including temporary personnel, visitors and contractors. The wearing of any jewellery isn't allowed. Plasters are batch tested.

7.3 Medical screening

Visitors and contractors have to complete a health questionnaire prior to entry to any production areas. Medical screening of internal/external employees as reviewed for (2016-04-19). Procedures are established for personnel to notify management of infectious conditions they may be suffering from or been in contact with. The site makes all visitors, new starters and contractors aware of the need to report infectious disease during the intake by the porter before entering the site. In case of a disease the company is consulting a specialised company doctor. Persons who are suffering from relevant infectious diseases are not allowed to enter the production facilities.

7.4 Protective clothing: employees or visitors to production areas

The laundering of protective clothing is outsourced to a contracted and specialised laundry
The wearing of sleeves, aprons and work coats isn't allowed during eating, smoking and using the toilets.. White protective shoes are worn (and washed before entering (boot wash) and after leaving (manual cleaning) production). Disposable hair nets are in use; beard snoods are in use. Cleaning facilities are provided. Knifes and metal gloves are washed internally following a manual cleaning procedure incl. disinfection.

Details of non-applicable clauses with justification

Clause reference	Justification

Module 8 - Traded Goods

Scope

8.1 Approval and performance monitoring of manufacturers/packers of traded food products

8.2 Specifications

8.3 Product inspection and laboratory testing

8.4 Product legality
8.5 Traceability

Module 9: Management of Food Materials for Animal Feed

Scope
9.1 Management Commitment
9.2 HACCP
9.3 Outsourced Production

9.4 Specifications
9.5 Traceability
9.6 Chemical and Physical Product Contamination Control
9.7 Labelling
9.8 Training

Module 11: Meat supply chain assurance

Scope

11.1 Traceability

11.2 Approval of meat supply chain

11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species

11.5 Product testing

11.6 Training

Lloyd's Register
LRQA